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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH GIULIANO,

Defendant.

Case No. 2:14-cr-371-JCM-DJA

EIGHTEENTH STIPULATION TO  
CONTINUE SENTENCING

The United States of America, through Jason M. Frierson, United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano, by and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this Honorable Court to vacate the sentencing hearing set for Wednesday, October 26, 2022, at 11:00 a.m. and reset the sentencing proceedings in this matter at a date on or after February 1, 2023.

The parties make this stipulation and motion for good cause and not for the purposes of delay.

Defendant Giuliano was struck by a car on October 6. He suffered significant injuries, was admitted to a hospital for 3 days, and continues to suffer cognitive effects from both

injuries and medications. He is under the continuing care of healthcare providers. While his providers anticipate a full recovery, they are unable to forecast a clear timeline. To allow adequate time for defendant Giuliano's recovery and ensure his ability to participate in the final preparation for sentencing and the sentencing itself unimpaired, the parties request this continuance of approximately 90 days.

Defendant Giuliano is not in custody and agrees to this continuance.

Denial of this request for continuance could result in a miscarriage of justice.

This is the eighteenth request to continue sentencing in this matter.

The parties respectfully request this Honorable Court issue the attached proposed Order to accomplish these ends.

Dated October 12, 2022

Counsel for Defendant  
JOSEPH GIULIANO

JASON M. FRIERSON  
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//s// Shawn R. Perez  
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//s// Daniel J Cowhig  
DANIEL J. COWHIG  
Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH GIULIANO,

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**ORDER**

**FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Based on the stipulation of the parties and the record in these matters, the Court finds that the parties make this stipulation and motion for good cause and not for the purposes of delay. The parties report that defendant Giuliano was struck by a car on October 6. He suffered significant injuries, was admitted to a hospital for 3 days, and continues to suffer cognitive effects from both injuries and medications. He is under the continuing care of healthcare providers. While his providers anticipate a full recovery, they are unable to forecast a clear timeline. To allow sufficient time for defendant Giuliano's recovery and ensure his ability to participate in the final preparation for sentencing and the sentencing itself unimpaired, the parties request a continuance of approximately 90 days. The parties agree that it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do so.

Defendant Giuliano is not in custody and agrees to this continuance.

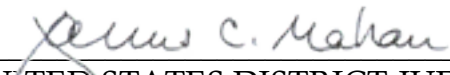
1 Denial of this request for continuance could result in a miscarriage of justice.

2 This is the eighteenth request to continue sentencing in this matter.

3 **ORDER**

4 **IT IS HEREBY ORDERED**, on the stipulation of the parties and good cause appearing  
5 therefor, that the sentencing hearing set for Wednesday, October 26, 2022 at 11:00 a.m. be  
6 vacated and reset to **February 8, 2023, at 10:00 a.m.** in Las Vegas Courtroom 6A.

7 **IT IS SO ORDERED** October 13, 2022.

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11 UNITED STATES DISTRICT JUDGE  
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